California Environmental Protection Agency AIR RESOURCES BOARD

Executive Order G-70-179

Certification of the Catlow ICVN-VI Vacuum Assist Phase II Vapor Recovery System

WHEREAS, the California Air Resources Board ("the Board" or "CARB") has established, pursuant to California Health and Safety Code sections 39600, 39601 and 41954, certification procedures for systems designed for the control of gasoline vapor emissions during motor vehicle fueling operations (Phase II vapor recovery systems) in its "CP-201 Certification Procedure for Vapor Recovery Systems of Dispensing Facilities" (the "Certification Procedures") as last amended April 12, 1996, incorporated by reference into Title 17, California Code of Regulations, Section 94011;

WHEREAS, the Board has established, pursuant to California Health and Safety Code sections 39600, 39601 and 41954, test procedures for determining the compliance of Phase II vapor recovery systems with emission standards in its "Certification and Test Procedures for Vapor Recovery Systems," CP-201.1 through CP-201.6 ("the Test Procedures") as adopted April 12, 1996, incorporated by reference into Title 17, California Code of Regulations, Section 94011;

WHEREAS, Catlow Incorporated ("Catlow") requested certification of the Catlow ICVN-VI bootless nozzle vapor recovery system (the "ICVN-VI system")

WHEREAS, the ICVN-VI system has been evaluated pursuant to the Board's Certification Procedures:

WHEREAS, the Certification Procedures (CP-201) provides that the Executive Officer shall issue an order of certification if he or she determines that the vapor recovery system conforms to all of the applicable requirements set forth in the Certification Procedures;

WHEREAS, I, Michael P. Kenny, Air Resources Board Executive Officer, find that the ICVN-VI system conforms with all the requirements set forth in the Certification Procedures, and results in a vapor recovery system which is at least 95 percent effective for attendant and/or self-serve use at gasoline service stations when used in conjunction with a Phase I vapor recovery system which has been certified by the Board and meets the requirements contained in Exhibit 2 of this Order.

NOW, THEREFORE, IT IS HEREBY ORDERED that the ICVN-VI system when used with a CARB-certified Phase I system, as specified in Exhibits 1 and 2 of this Order, is certified to be at least 95 percent effective in attended and/or self-serve mode. Compatibility of this system with the onboard vapor recovery systems ("ORVR") has not been evaluated to determine the emissions impact. Fugitive emissions which may occur when the underground storage tanks are under positive pressure have not been quantified and were not included in the calculation of system effectiveness. Exhibit 1 contains a list of

the equipment certified for use with the Catlow ICVN-VI system. Exhibit 2 contains installation and performance specifications for the system. Exhibit 3 contains a procedure for testing the static pressure integrity of the underground storage tank. Exhibit 4 contains a procedure for verifying dispensing rate.

IT IS FURTHER ORDERED that the dispensing rate for installations of the ICVN-VI system shall not exceed ten (10.0) gallons per minute when only one nozzle associated with the product supply pump is operating. This is consistent with the flowrate limitation imposed by United States Environmental Protection Agency as specified in the Federal Register, Volume 58, Number 55, page 16019. Dispensing rate shall be verified as specified in Exhibit 4.

IT IS FURTHER ORDERED that compliance with the certification requirements and rules and regulations of the Division of Measurement Standards of the Department of Food and Agriculture, the State Fire Marshal's Office, and the Division of Occupational Safety and Health of the Department of Industrial Relations is made a condition of this certification.

IT IS FURTHER ORDERED that the following requirements are made a condition of certification. The ICVN-VI system shall be installed only in facilities which are capable of demonstrating on-going compliance with the vapor integrity requirements contained in Exhibit 3 of this Order. The owner or operator of the installation shall conduct, and pass, a Static Pressure Decay test as specified in Exhibit 3, no later than 60 days after startup and at least once in each twelve month period. The owner or operator of the installation shall conduct, and pass, an Air-to-Liquid Ratio test as specified in TP-201.5 no later than 60 days after startup and at least once in each twelve month period thereafter. The test results shall be made available to the local air pollution control or air quality management district upon request within fifteen days after the tests are conducted, or within fifteen days of the request. Alternative test procedures may be used if determined by the Executive Officer, in writing, to yield comparable results.

IT IS FURTHER ORDERED that the ICVN-VI system, as installed, shall comply with the procedures and performance standards the test installation was required to meet during certification testing. If, in the judgment of the Executive Officer, a significant fraction of installations fail to meet the specifications of this certification, or if a significant portion of the vehicle population is found to have configurations which significantly impair the system's collection efficiency, the certification itself may be subject to modification, suspension or revocation.

IT IS FURTHER ORDERED that the certified ICVN-VI system shall, at a minimum, be operated in accordance with the manufacturer's recommended maintenance intervals and shall use the manufacturer's recommended operation, installation, and maintenance procedures.

IT IS FURTHER ORDERED that all nozzles approved for use with the ICVN-VI system shall be 100 percent performance checked at the factory, including checks of the integrity of the vapor and liquid path, as specified in Exhibit 2 of this Order, and of the proper functioning of all automatic shut-off mechanisms.

IT IS FURTHER ORDERED that each vapor pump shall be adjusted and 100 percent performance checked at the factory, including verification that the pump performance is within the range specified in Exhibit 2 of this Order.

IT IS FURTHER ORDERED that each vapor pump shall be adjusted and 100 percent performance checked at the factory, including verification that the pump performance is within the range specified in Exhibit 2 of this Order.

IT IS FURTHER ORDERED that the certified ICVN-VI system shall be performance tested during installation for ability to dispense gasoline and collect vapors without difficulty, in the presence of the station manager or other responsible individual. Catlow shall provide CARB-approved manuals to the station manager, owner or operator shall also be provided with instructions in the proper use of the ICVN-VI system, its repair and maintenance, where system and/or component replacements can be readily obtained, and shall be provided with copies of the installation and maintenance manuals for the ICVN-VI system to be maintained at the station. Revisions to the manual are subject to approval by CARB.

IT IS FURTHER ORDERED that the certified ICVN-VI system shall be warranted by Catlow, in writing, for at least one year, to the ultimate purchaser and each subsequent purchaser, that the vapor recovery system is designed, built and equipped so as to conform at the time of original installation or sale with the applicable regulations and is free from defects in materials and workmanship which would cause the vapor recovery system to fail to conform with applicable regulations. Catlow shall provide copies of the manufacturer's warranty and the operating and maintenance manuals for the Catlow ICVN-VI system to the station manager, owner or operator. Hoses, nozzles and breakaway couplings shall be warranted to the ultimate purchaser as specified above for at least one year, or for the expected useful life, whichever is longer.

IT IS FURTHER ORDERED that any alteration of the equipment, parts, design, or operation of the systems certified hereby is prohibited, and deemed inconsistent with this certification, unless such alteration has been approved by the Executive Officer or his/her designee.

Executed at Sacramento, California, this ______ day of _______, 1997

Michael P. Kenny Executive Officer

Attachments

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Exhibit 1

Catlow ICVN-VI System Equipment List

Component	Manufacturer/Model	State Fire Marshal Identification Number	
Nozzles	Catlow ICVN (Figure 1A) with vapor valve and ECD*	005:030:014	
	Richards Astrovac (Figure 1B) with vapor valve and ECD*	005:031:018	
	OR- Any bootless nozzle which has with the ICVN-VI system.	n has been CARB certified for use	
	* ECD: Efficiency Compliance Device	ce	
Inverted Coaxial Hoses	Catlow Vapor Mate Dayco 7282 Superflex 2000 Dayco 7292 Superflex 4000 Dayco 7246 Flex-Ever Ultimate Goodyear Flexsteel GT Sales/Hewitt Superflex 2000 Thermoid Hi-Vac Thermoid Hi-Vac S VST VSTalflex VST VST-CIS OR- Any inverted coaxial hose CAICVN-VI system.	005:033:005 005:033:005 005:033:006 005:033:007 005:036:002 005:037:003 005:037:004 005:052:001 005:052:001	
Breakaway Couplings	Catlow AV2001 Catlow AVR200S Emco Wheaton A5219-001 Husky 4034 OPW 66CIP OPW 66FLB (w/ Flow Limiter) OPW 66CAS Richards Industries VA-50 VA-50B VA-60 STVA (w/ Swivel)	005:030:006 005:030:010 005:030:010 005:021:009 005:030:006 005:008:055 005:008:056 005:031:007 005:031:014 005:031:009 005:031:016	

 $\underline{\mathsf{OR}}\text{-}$ Any inverted coaxial breakaway with a vapor valve which is CARB-certified for use with the ICVN-VI system.

Component	Manufacturer/Model	State Fire Marshal Identification Number	
Swivels	Richards MFVA	005:031:015	
	<u>OR</u> - Any inverted coaxial swivel which is CARB-certified for use with the ICVN-VI system.		
Flow Control Units	Catlow I10G-1A Husky 5837 OPW 66FL OPW 66FD Richards FRVAD Vapor Systems Technologies (VST) OR- Any inverted coaxial flow control uncertified for use with the ICVN-VI system		
Vapor Pumps	Blackmer hydraulically driven vapor pump with a rotary vane motor. Model Number: VRFC	005:008:053	
Pressure/Vacuum Valve	OPW 523LP, 523LPS (settings as specified below) Hazlett H-PVB-1 Gold label (settings as specified below) Morrison Brothers 749CRB0600 AV	005:008:051 005:017:004 005:041:001	
	(settings as specified below) Morrison Brothers 749CRBS0600 AV (settings as specified below)	005:041:001	
	OR- Any CARB-certified valve with the and vacuum settings, in inches water col <i>Pressure</i> : three plus or minus one-ha (3.0 ± 0.5") water column. Vacuum: eight plus or minus two inch (8 ± 2") water column.	er column (wc): ne-half inches	

Phase I Product Adaptors Any CARB-certified rotatable Phase I product adaptor such as the OPW 61SA.

NOTE: For systems installed before two CARB-certified rotatable Phase I product adaptors are available, or within sixty days after that date, any standard Phase I product adaptor may be used for a period not to exceed four years from the date the second rotatable Phase I product adaptor was certified.

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Exhibit 2

Specifications for the ICVN-VI Bootless Nozzle System

Figure 2A depicts the vapor pump mounting for the ICVN-VI system with different dispenser configurations. Proper posotioning of the adapter for Air-to-Liquid testing is shown in Figure 2B. Figures 2C-1 through 2C-4 contain drawings of a typical installation of the ICVN-VI system.

Nozzles

- 1. An efficiency compliance device (ECD) shall be installed on the nozzle at the base of the spout, as shown in Figures 1A and 1B. Any nozzle with an ECD which is missing, or which is damaged such that at least three quaters (3/4) of the diameter is missing, or which has cumulative damage equivalent to at least 3/4 of the diameter missing, is defective and shall be immediately removed from service.
- 2. Failure mode testing demonstrated that blockage of some of the vapor collection holes in the spout has negligible effect on the operation of the system until only four holes remain unblocked. Any nozzle which is found to have less than four unobstructed vapor collection holes is defective and shall be immediately removed from service.
- 3. The ICVN and Astrovac nozzles each have an integral vapor valve which prevents the loss of vapor from the underground storage tanks and ensures proper operation of the system. Any nozzle with a defective vapor valve shall be immediately removed from service and the vapor path shall be closed as soon as practicable.
- 4. Nozzles shall be 100 percent performance checked at the factory, including checks of all shutoff mechanisms and of the integrity of the vapor path. The maximum allowable leak rate for the nozzle shall not exceed the following:
 - 0.038 CFH at a pressure of two inches water column (2" wc), and 0.005 CFH at a vacuum of twenty seven inches water column (approx. 1 psi).
- 5. No sealing of the vapor holes on the nozzle spout (such as placing a balloon or the fingers of a glove over the holes) is permitted during static pressure decay tests.

Inverted Coaxial Hoses

- 1. The length of hose which may be in contact with the island and/or ground when the nozzle is properly mounted on the dispenser is limited to six inches (6").
- 2. Within the constraints of the accepted configuration, high or low hang, the maximum allowable length of the hose shall be fifteen feet (15').

Breakaway Couplings

1. Breakaway couplings are optional but, if installed, only CARB-certified breakaways which close the vapor path may be used.

ICVN-VI System

- One Blackmer model VRFC pump shall be installed for each dispensing nozzle. Figure 2A
 provides an illustration for the typical mounting of the vapor pump with low and high hose
 hang dispenser configurations.
- The pump shall be installed, at a minimum, in accordance with the instructions of the manufacturer. Any modification of the dispenser piping must be made in accordance with the instructions of the dispenser manufacturer.
- 3. The pump shall be serviced only by a qualified contractor. Field service of the pump is prohibited.
- 4. The pump makes an audible clicking sound when operating normally. The clicking sound may be masked by background noise.
- 5. The normal operating range of the system, as measured by air-to-liquid (A/L) ratio testing, is 1.02. plus or minus 0.10 (0.92 to 1.12). The A/L ratio shall be determined by the CARB-approved (TP-201.5) and shall be measured at a flowrate between six and ten gallons per minute (6 10 gpm). Alternative test procedures may be used if they are determined by the Executive Officer to yield comparable results. Any fueling point not capable of demonstrating compliance with this performance standard shall be deemed defective and removed from service.

The measurements shall be taken not including the nozzle aspirator port. It is recommended that the aspirator contribution be excluded because this volume is injected into the product stream and does not go through the vapor pump. Figure 2B illustrates the proper configuration of the A/L adapter.

NOTE: This test procedure returns air rather than vapor to the storage tank, and normally causes an increase in storage tank pressure which may result in vent emissions. This is a temporary condition due to the test and should not be considered an indication of malfunction or noncompliance.

Pressure/Vacuum Valves for Storage Tank Vents

1. A pressure/vacuum (P/V) valve shall be installed on each tank vent. Vent lines may be manifolded to minimize the number of P/V valves and potential leak sources, provided the manifold is installed at a height not less than 12 feet above the driveway surface used for Phase I tank truck filling operations. At least one P/V valve shall be installed on manifolded vents. If two P/V valves are desired, they shall be installed in parallel, so that each can serve as a backup for the other if one should fail to open properly. The P/V valve shall be a CARB-certified valve as specified in Exhibit 1. The outlets shall vent upward and be located to eliminate the possibility of vapor accumulating or traveling to a source of ignition or entering adjacent buildings.

Vapor Recovery Piping Configurations

- 1. The recommended maximum pressure drop through the system, measured at a flow rate of 60 SCFH with dry Nitrogen gas, is 0.02 inches water column (0.03 inches wc at 60 SCFH if the measurement includes an impact valve). The maximum allowable pressure drop through the system shall never exceed one/half inch (0.5") water column at 60 SCFH. The pressure drop shall be measured from the dispenser riser to the UST with the pressure/vacuum valves installed and with the poppeted Phase I vapor connection open.
- 2. All vapor return lines shall slope a minimum of 1/8 inch per foot. A slope of 1/4 inch or more per foot is recommended wherever feasible.
- 3. The dispenser shall be connected to the riser with either flexible or rigid material which is listed for use with gasoline. The dispenser-to-riser connection shall be installed so that any liquid in the lines will drain toward the storage tank. The internal diameter of the connector, including all fittings, shall not be less than three-fourths inch (3/4").
- 4. The recommended nominal inside diameter of the underground Phase II plumbing is as indicated in Figures 2C-1 through 2C-4. Smaller vapor lines are not recommended but may be used provided the pressure drop criteria specified above are met. The vapor return lines shall be manifolded as shown in Figures 2C-1 through 2C-4.
 - EXCEPTION: For installations with a vapor return line directly to only one tank, and for which a manifold on the tank vents will be used to provide part of the vapor return path to other tanks, the vent manifold may be used as an alternative to the underground manifold only in existing installations where the vapor piping is already installed, and shall not be used in "new" installations where vapor piping is being installed. For installations with dedicated vapor piping directly to each tank, the vent manifold is approved for both new and existing installations and an additional tank manifold below grade is optional but not required.
- 5. All vapor return and vent piping shall be installed in accordance with the manufacturer's instructions and all applicable regulations.

6. No product shall be dispensed from any fueling point associated with a vapor line which is disconnected and open to the atmosphere. If vapor lines are manifolded, this includes all fueling points in the facility.

Phase I System

WARNING: Phase I fill caps should be opened with caution because the storage tank may be under pressure.

The Phase I system shall be a CARB-certified system which is in good working order and which demonstrates compliance with the static pressure decay test criteria contained in Exhibit 3 of this Order. Coaxial Phase I systems shall not be used with new installations of the system. Replacement of storage tanks at existing facilities, or modifications which cause the installation of new or replacement Phase I vapor recovery equipment, are considered new installations with regard to this prohibition. An exception to this prohibition may be made for coaxial Phase I systems CARB-certified after January 1, 1994, as compatible for use with Phase II systems which require pressure/vacuum vent valves.

Where installation of the Catlow ICVN-VI system is made by retrofitting previously installed equipment, local districts may elect to allow existing coaxial Phase I systems to remain in use for a specifically identified period of time provided the following conditions are met:

- the existing coaxial Phase I system is a poppeted, CARB-certified system capable of demonstrating compliance with the static pressure decay test as specified above when tested with the fill cap removed; and
- installation of the Phase II system requires no modification of the UST(s) and/or connections.
- 2. Spill containment manholes which have drain valves shall demonstrate compliance with the static pressure decay criteria with the drain valves installed as in normal operation. Manholes with cover-actuated drain valves shall not be used in new installations (as defined above). Manholes with cover-actuated drain valves may remain in use in facilities where installation of the Catlow ICVN-VI system does not require modification of the tank fittings provided the facility demonstrates compliance with static pressure decay test criteria both with the cover open and with the cover closed.
- 3. The Phase I vapor recovery system shall be operated during product deliveries so as to minimize the loss of vapors from the facility storage tank which may be under pressure. There shall be no less than one vapor return hose connected for each product being delivered. Provided it is not in conflict with established safety procedures, this may be accomplished in the following manner:
 - the Phase I vapor return hose is connected to the delivery tank and to the delivery elbow before the elbow is connected to the facility storage tank;
 - the delivery tank is opened only after all vapor connections have been made, and is closed before disconnection of any vapor return hoses;

- the vapor return hose is disconnected from the facility storage tank before it is disconnected from the delivery tank.
- 4. Phase I deliveries shall be accomplished so as to ensure that there is at least one vapor connection between the cargo tank compartment headspace and the storage tank associated with the product delivery. There shall be no more than two product hoses used with one vapor hose connected, and no more than three product hoses used with two vapor hoses connected.
- 5. Storage tank vent pipes, and fill and vapor and manhole tops, shall be maintained white, silver or beige. Colors which will similarly prevent heating of the system due to solar gain may also be used, provided they are listed in EPA AP-42 as having a factor the same as or better than that of the colors listed above. Existing facilities which were installed before April 1, 1996, must be in compliance with this requirement no later than January 1, 1998. Manhole covers which are color coded for product identification are exempted from this requirement.